

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

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UNITED STATES OF AMERICA

- against -

YONG ZHU,  
also known as "Jason Zhu,"

Defendant.

Case No. 21-265 (PKC)

HON. PAMELA K. CHEN

MOTION FOR MODIFICATION OF  
BOND AND CONDITIONS OF  
RELEASE

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The undersigned, Kevin K. Tung, Esq., under penalty of perjury, affirms:

1. I represent defendant Yong Zhu in the above-captioned case.
2. Defendant Yong Zhu is currently subject to G.P.S. ankle monitoring and home confinement.
3. I am writing on behalf of Mr. Yong Zhu, requesting that Mr. Zhu is permitted to travel outside of his home between the hours of 9 a.m. through 9 p.m. each and every day, seven (7) days a week.
4. I have conferred the above request with the United States Attorney Office on the case in December of 2021 with no objection. However, before I had a chance to submit this instant motion, my client Yong Zhu was allegedly found in violation of his bond and conditions of release by Pre-trial Services (EMUnit).
5. Thereafter, United States Attorney Office indicated that they needed to investigate the allegations. Several months went by, I have no knowledge whether or not Mr. Yong Zhu was finally determined in violation of his bond and conditions of release.
6. To my knowledge, all other defendants have been granted similar modifications of bond and conditions of release.
7. I have conferred with the United States Attorney Office recently regarding this instant motion. I have received a response from United States Attorney Office that they have no objection to this instant motion for modification of Bond and Conditions of Release of Defendant Yong Zhu.
8. On behalf of the defendant Yong Zhu, I hereby request that Mr. Zhu shall still be subject to G.P.S. ankle monitoring and home confinement except that Mr. Zhu is permitted to

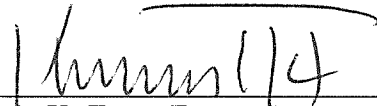
travel outside of his home between the hours of 9 a.m. through 9 p.m. each and every day, seven (7) days a week.

9. Mr. Zhu shall observe curfew between the hours of 9 p.m. through 9 a.m. of the next day, each and every day, seven (7) a week.
10. Mr. Zhu shall be restricted from contacting or entering within a 200-foot radius of the Embassy or Consulate of the People's Republic of China or any other establishment controlled by the People's Republic of China.
11. All other bond and conditions of release shall remain in full force and effect.

WHEREFORE, the Defendant Yong Zhu respectfully moves this Court for an Order modifying the conditions of Mr. Zhu's pre-trial release so that he would be placed on curfew from 9 am to 9 pm, seven (7) days a week.

Dated: March 31, 2022

KEVIN KERVENG TUNG, P.C.  
On behalf of Defendant YONG ZHU

  
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